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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-cv-05944 (SC)

MDL No. 1917

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
Case No. C 13-1173 (SC)

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF
SHARP'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

(CIVIL LOCAL RULE 79-5(d))

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am an active member in good standing of the bars of the State of Maryland, the State of
3 New York, and the District of Columbia and on March 20, 2013 was granted leave to appear *pro hac*
4 *vice*. (ECF 12.) I am associated with the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP,
5 counsel to Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of
6 America, Inc. (collectively, "Sharp"). I submit this Declaration in support of Sharp's Administrative
7 Motion to Seal Portions of Sharp's Opposition to Thomson, S.A.'s Motion to Dismiss Sharp's First
8 Amended Complaint ("Motion to Seal"). I have personal knowledge of the facts stated herein and could
9 competently testify to these facts if called as a witness.

10 2. Portions of Sharp's Opposition to Thomson S.A.'s Motion to Dismiss Sharp's First
11 Amended Complaint ("Motion to Dismiss") contain discussion, analysis, references to, or information
12 taken directly from material designated by a Defendant or Defendants in this matter as "Confidential" or
13 "Highly Confidential." pursuant to the Protective Order applicable in this action. Specifically, portions
14 of Sharp's Opposition to Thomson, S.A.'s Motion to Dismiss the First Amended Complaint at pages
15 2:10-22, 5:10-24, 5:28, 6:6-11, 6:15-19, 6:21-24, 9:4-6, 9:15-20, 9:23-28, 10:8-9, 12:23-24, 13:1-9, and
16 21:21-23 contain such information.

17 3. As more fully described in the concurrently filed Motion to Seal, all information sought
18 to be sealed in the instant Motion to Seal Sharp's Motion to Dismiss have been the subject of prior
19 motions to seal in this case (ECF 1834 & 2030), and the Court has granted the motions to seal the
20 information referenced in paragraph 2, above, in connection with those sealing motions. Orders at ECF
21 1852 & 2211.

22
23 I declare under penalty of perjury, under the laws of the United States of America, that the
24 foregoing is true and correct. Executed this 28th day of October, 2013 in Washington, DC.

25
26 /s/ Craig A. Benson

27 Craig A. Benson